

FILED

500.00

AUG 22 2017

Charles Halphen
DEPUTY CLERK
20TH JUDICIAL DISTRICT COURT
BOSSIER PARISH, LOUISIANA

CHARLES A. RASCO

FILED AND RECORDED
BOSSIER PARISH, LOUISIANA
NUMBER:

153835

VERSUS

2017 AUG 22 PM 2:21 20TH JUDICIAL DISTRICT COURT

MARGARITAVILLE RESORT CASINO,
D/B/A BOSSIER CASINO VENTURE, INC.,
BEN LNU, DELORES LNU AND
YOLANDRA GREEN

BOSSIER PARISH, LOUISIANA

DIV. C - COX

PETITION FOR DAMAGES

NOW INTO COURT, through undersigned counsel, comes and appears CHARLES RASCO, (hereinafter referred to as CHARLES RASCO or PETITIONER) a person of the full age of majority and resident of Shreveport, Caddo Parish, Louisiana, who respectfully represents:

1.

Made defendants in this action are Bossier Casino Venture, Inc., d/b/a MARGARITAVILLE, located at 777 Margaritaville way, Bossier City, Louisiana 71111, Ben Last Name, Unknown, employee of Margaritaville Resort Casino, Delores Last Name Unknown, employee of Margaritaville Resort Casino, and Yolandra Green, employee of Margaritaville Resort Casino. Petitioner reserves the right to amend and supplement the names of the defendant's labeled in the foregoing petition as the information is obtained.

2.

Petitioner shows that on or about the 14th day of May, 2017, he was gambling at the casino, playing a game known as Mississippi Stud.

3.

Mr. Rasco is an African American male who has reached the status of a high level player at the Margaritaville Resort Casino.

4.

Petitioner shows that during the course of his gambling that the dealer repeatedly turned over his cards, after being requested not to, and did not turn over any of the other players cards, particularly the white people.

5.

Petitioner shows that the whole time that he gambled during the morning hours that he



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repeatedly asked the dealer not to flip over his cards, as they did not flip over the other players cards.

6.

Petitioner shows that the dealer's conduct was so bad the dealer was removed from the table and replaced with another dealer.

7.

At some point during the day, Mr. Rasco left the casino and attended a function for his granddaughter.

8.

Mr. Rasco returned to the casino later in the afternoon for gaming, and once again began playing Mississippi Stud.

9.

Mr. Rasco is a well known player at the Margaritaville Resort Casino and when he returned to gamble, the dealer again began practicing a discriminatory practice against Mr. Rasco by flipping over his cards when requested not to while not flipping over anyone else's cards.

10.

Petitioner shows, that upon information and belief, that the dealer and the pit boss may have some sort of an improper relation going on, and that she told the pit boss to have Mr. Rasco removed from the boat.

11.

Petitioner shows that upon returning to the casino for more gaming, that he began to lose a substantial amount of money, at which time he was suddenly approached and informed that they no longer needed his business.

12.

Petitioner shows that he feels that he has been discriminated against solely due to his skin

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color and shows that such activity is prohibited and should render the defendant liable for its actions.

13.

Petitioner shows that Mr. Rasco was wrongfully evicted and that the wrongful eviction from the boat has caused him great embarrassment and shame and that he has had nightmares as a result of the actions of the Casino.

14.

Petitioner further shows that he has gambled thousands of dollars at the Margaritaville Resort Casino and has achieved the second highest level of player class at the Casino, achieving the rank of "Islander" Which caused him to receive numerous benefits that were not available to ordinary players, including but not limited to free rooms, free gifts, free concert tickets and other benefits and amenities.

15.

Petitioner shows that as a result of the defendants' conduct that he has been stripped of this status and has in fact been barred from this Casino for no reason whatsoever.

16.

Petitioner shows that as a direct result of the actions of the defendant, that he has suffered humiliation, public embarrassment and loss of his players status merely due to the fact that the dealer and pit boss conspired against him to have him removed from the boat and barred from the Casino.

17.

Petitioner shows that he has been deprived from due process of law and had a taking without compensation by removing him from the Casino and taking his player status away from him.

18.

Petitioner shows that, unless he has gambled and put at risk thousands of dollars, that he could have never made pilot status and as a result has been deprived of his play on this

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boat.

19.

Petitioner shows that the defendant's herein are all employees of Margaritaville Resort Casino and as such the Casino is liable for their actions pursuant to *respondent superior*.

20.

Petitioner shows that as a result of the actions of the casino and its employees, that he has been required to seek mental health professional for counseling concerning his emotional distress caused by him being removed from this boat for no reason whatsoever.

21.

Petitioner shows that he has caused a demand letter to be sent to the Margaritaville Resort Casino requesting a copy of the video surveillance of the Mississippi Stud table for the date of incident and they have refused and failed to produce same.

22.

Petitioner desires an order directing Margaritaville Resort Casino to produce the video surveillance tape playing of the Mississippi Stud table showing the practicing of the discriminatory acts against Mr. Rasco during his play.

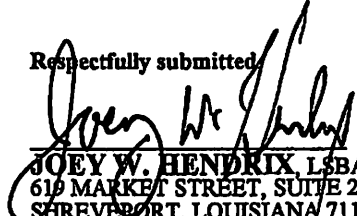
WHEREFORE CHARLES RASCO PRAYS that the defendants be duly served, cited and ordered to answer this petition and that after all legal delays and due proceedings had that there be judgement rendered in his favor in the largest amount reasonable under the premisses against Margaritaville Resort Casino and its employees.

Petitioner further prays an order issued herein directing Margaritaville Resort Casino to produce within 15 days after service of this petition copies of the video surveillance from May 14, 2017, of the Mississippi Stud table from 7am until 9pm.

153835

For all just and equitable relief.

Respectfully submitted,


JOEY W. HENDRIX, LSBA #: 17,967
619 MARKET STREET, SUITE 275
SHREVEPORT, LOUISIANA 71104
TELEPHONE: 318/222-0070
FACSIMILE: 318/220-0022
hendrixlaw@aol.com

ATTORNEY FOR PETITIONER:
CHARLES RASCO

Please serve:

BOSSIER CASINO VENTURE INC.
Through it registered agent for service of process
BARRY REGULA
777 Margaritaville Way
Bossier City, LA 71111

Yolanda Green
777 Margaritaville Way
Bossier City, LA 71111

Hold service:

For Ben LNU

Delores LNU

D4004396

CITATION

CHARLES A RASCO	TWENTY-SIXTH JUDICIAL DISTRICT
VS	PARISH OF BOSSIER
MARGARITAVILLE RESORT CASINO ET AL	STATE OF LOUISIANA
DOCKET NUMBER: C-153835	

TO: BOSSIER CASINO VENTURE INC
THROUGH ITS REGISTERED AGENT FOR SERVICE OF PROCESS BARRY VIREGULA
777 MARGARITAVILLE WAY
BOSSIER CITY, LA 71111

116308

①

in the Parish of BOSSIER.



You are hereby cited to comply with the demand contained in the petition, a certified copy of which accompanies this citation, or to file your answer or other pleading to said petition in the office of the Clerk of the 26th Judicial District Court in the Bossier Parish Court House in the Town of Benton in said Parish within fifteen (15) days after the service hereof. Your failure to comply herewith will subject you to the penalty of entry of default judgment against you.

The Sheriff or his deputy has just handed you a law suit which states why you are being sued. You (as defendant) will have fifteen (15) days after you receive this petition to either file an answer (in writing) with the Bossier Parish Clerk of Court in Benton, Louisiana, or retain an attorney of your choice to act in your behalf. If you do nothing within the said time period, then a judgment could be rendered against you.

Attached hereto are:
PETITION FOR DAMAGES; INTERROGATORIES; ORDER

Witness the Honorable Judges of our said Court on this the 25TH DAY OF AUGUST, 2017

JILL M. SESSIONS, CLERK OF COURT


Deputy Clerk
Bossier Parish, Louisiana

Attorney:
JOEY W. HENDRIX
619 MARKET STREET, SUITE 275
SHREVEPORT, LA 71101
318-22-0070

SERVICE INFORMATION

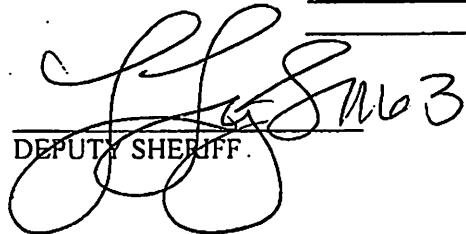
UNSERVED
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☒

GIVEN TO

8/29/17

DATE
REMARKS


DEPUTY SHERIFF.

FILED

AUG 29 2017

DEPUTY CLERK
26TH JUDICIAL DISTRICT COURT
BOSSIER PARISH LOUISIANA

D4004404

CITATION

CHARLES A RASCO	TWENTY-SIXTH JUDICIAL DISTRICT
VS	PARISH OF BOSSIER
MARGARITAVILLE RESORT CASINO ET AL	STATE OF LOUISIANA
DOCKET NUMBER: C-153835	

TO: YOLANDRA GREEN
777 MARGARTITAVILLE WAY
BOSSIER CITY, LA 71111

1163
08 Yusuf
(3)
in the Parish of BOSSIER.



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Jill M. Sessions

Deputy Clerk
Bossier Parish, Louisiana

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JOEY W. HENDRIX
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SHREVEPORT, LA 71101
318-22-0070

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DATE
REMARKS

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AUG 29 2017

DEPUTY CLERK
26TH JUDICIAL DISTRICT COURT
BOSSIER PARISH, LOUISIANA

[Signature]
DEPUTY SHERIFF